LIFE IS GOOD, INC. V. LG ELECTRONICS U.S.A., INC
Civil Action No. 04 11290 WGY

DECLARATION OF TIMOTHY LEMPER IN SUPPORT OF DEFENDANTS' MOTION IN LIMINE
TO STRIKE THE SURVEY OF PLAINTIFF'S EXPERT ROBERT KLEIN

Exhibit 3

Exploratory

RESPONDENT NAME: _____

INTRODUCTION:

- From AMS – research about customer needs to help companies develop and improve services and products . . .
- Confidential
- Colleagues viewing

WARM-UP:

- I'd like to start off by asking you what you recognize about various logos.
- For each one that I present to you, please tell me the company you associate with it. If you do not know, it is ok to say so.
- Show 6 logos – for each, write verbatim response

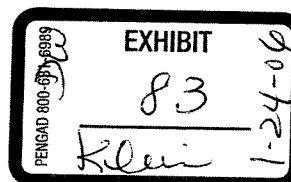| 1.	4.
2.	5.
3.	6.

I am now going to present you with some phrases. For each one that I present to you, please tell me what comes to mind?

For example, when talking with other people, I have said "THE REAL THING" to people, some of the responses I heard were:

- *Beverages*
- *coke*
- *coca cola company*
- *a play or book by Tom Stoppard*
- *Something that is not an imitation*

There are no right or wrong answers. I am just trying to see what is top of mind for you.

1.	5.
2.	6.
3.	7.

AMS 000155

Exploratory

⬛ End with "When I say LIFE IS GOOD, what comes to mind?" [CAPTURE VERBATIM RESPONE, ASK ANYTHING ELSE]

⬛ If "A" response does not mention any product or service, ask "Do you or do you not associate LIFE IS GOOD with any products or services? If YES, ASK "Which ones?' [CAPTURE VERBATIM RESPONE, ASK ANYTHING ELSE, PROBE UNTIL NO MORE SAID]

⬛ Ask everyone

Show STIMULUS 1 (LIG slogan and logo) and then STIMULU 2 (LG slogan and logo) [ROTATE]

[READ] You will now view two images. Please review them as if you might if you saw them in advertising or on products.

[READ] Thinking about the images you just viewed, which of the following do you best describes your belief about the image you saw first and the second image you viewed? [PRESENT CARD WITH OPTIONS]

☑ The images are associated with the same company
☑ The images are associated with different companies that <u>do not have</u> a business connection or affiliation *different*
☐ The images are associated with companies that <u>have</u> a business connection or affiliation
☐ Something else?
☐ You are unsure or have no opinion

[READ] Why do you say that? PROBE.

Exploratory

■ DEBRIEF SECTION FOR ALL RESPONDENTS

Review of LIG and LG images.

❑ Discuss what they know and do not know about the images /companies/ products

❑ See how people respond to them side by side.

❑ Does anyone respond about evolution of image

❑ Show good/life slogans – evaluate reactions

❑ Show possible controls